

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Reginald Albert Benjamin

Debtor 1

Lindsey Rae Benjamin

Debtor 2

CrossCountry Mortgage, LLC

Movant(s)

v.

Reginald Albert Benjamin

Lindsey Rae Benjamin

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:24-BK-01762-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 37

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Reginald Albert Benjamin and Lindsey Rae Benjamin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.

5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 5; therefore, it is denied.

6. Upon information and belief, the averment as stated in Paragraph 6 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 8; therefore, it is denied.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, it is denied.

11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: October 8, 2024

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, October 8, 2024, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Brent Lemon, Esquire

KML Law Group

701 Market Street, Suite 5000

Philadelphia, PA 19106

Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Office of the United States Trustee

Sylvia H. Rambo United States Courthouse

1501 North Sixth Street, Floor 3

Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.

Paralegal for Paul D. Murphy-Ahles, Esquire